

# **EXHIBIT 3**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)**

GREEN & HEALTHY HOMES INITIATIVE,  
INC., *et al.*,

Plaintiffs,

v.

ENVIRONMENTAL PROTECTION AGENCY,  
*et al.*,

Defendants.

Civil Action No. 25-01096-ABA

**SUPPLEMENTAL DECLARATION OF RUTH ANN NORTON**

I, Ruth Ann Norton, am over the age of 18 and am competent to testify. I declare as follows:

1. I am President and Chief Executive Officer of Green & Healthy Homes Initiative, Inc. (“GHHI”).
2. As described in my Declaration submitted in connection with Plaintiffs’ Motion for Preliminary Injunction, the EPA’s termination and suspension of GHHI’s Thriving Communities grants will force GHHI to imminently shut down its implementation of the Thriving Communities program and cause irreversible harms to GHHI, its partners, its subgrantee organizations, and the communities they serve. I submit this supplemental declaration to provide information regarding the harms that GHHI has experienced since the filing of this case, as well as additional information about the severe harms that we anticipate incurring if we do not obtain preliminary relief in this case.

3. Operationally, GHII is now at a breaking point. Our organization cannot continue to cover salaries for employees who were to be funded over a three-year period from the Thriving Communities initial and subsequent grants.

4. Earlier today, GHII sent letters to three employees informing them they will be laid off effective May 1, 2025, if the organization's Thriving Communities grants are not reinstated and access to grant funding not restored by April 30, 2025.

5. The letters were sent to our Program Administration Coordinator and two of our Program Officers who currently work full-time under the Thriving Communities program. The Program Administrator is the lead administrative employee for the program and is responsible for, among other tasks, coordinating events, preparing program materials, and handling the administration of communications related to the program. The Program Officers conduct grant application reviews and serve as the point-of-contact for the subgrantee organizations with responsibilities to oversee the development, implementation, and evaluation of the subgrantee projects.

6. GHII will soon be forced to lay off additional employees if access to the Thriving Communities grant funding is not promptly restored.

7. GHII's \$8 million grant remains terminated, and GHII has had no access to those funds since January 29, 2025.

8. GHII's access to its \$52 million Thriving Communities subsequent grant remains suspended. EPA has provided no concrete information about the nature of the suspension or whether it will ultimately be lifted.

9. The EPA's actions have also continued to damage GHII's relationships. There has been widespread confusion among partner and subgrantee organizations regarding the status of

the Thriving Communities program and GHHI's access to the grant funding, which in turn has led these organizations to question GHHI's ability to fulfill its commitments. This reflects poorly on our organization.

10. The EPA's termination and suspension of the grants will severely impair GHHI's ability to pursue its organizational mission and objectives. The mission of GHHI is to create healthier communities and address social, economic, and environmental inequities. For more than 30 years, GHHI has been a national leader in spearheading effective and innovative work to improve the health, economic, and social outcomes of the nation's disadvantaged communities by breaking down barriers, building local capacity, and designing effective programs to reduce environmental health threats such as childhood lead poisoning, air pollution, and greenhouse gas emissions.

11. GHHI applied to be a Regional Grantmaker for the Thriving Communities program to further its mission. The program's scale and design fit well with GHHI's goals and capacities. Before the EPA's termination of the program, GHHI developed extensive additional subject matter expertise and cultivated new relationships across the Mid-Atlantic region, all to support local entities seeking to improve the health and safety of residents in their respective communities. If our Thriving Communities grants are not restored, this work will be lost. We will lose staff members whose knowledge and skills have become essential to the fulfillment of our mission, and we will lose the organizational ecosystem, linking us to partners, advisors, and subgrantees across the region, that we created over the past 18 months.

12. The EPA's abrupt termination and suspension of GHHI's Thriving Communities grants will result in the shuttering of the program and will cause significant and incalculable damage to GHHI's fulfillment of its organizational mission.

Date: April 23, 2025

DocuSigned by:  
  
Ruth Ann Norton  
0171FED32CD49A..